

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

ALLIANCE OPHTHALMOLOGY, PLLC;
DALLAS RETINA CENTER, PLLC;
TEXAS EYE AND CATARACT, PLLC;
AND HOFACRE OPTOMETRIC
CORPORATION, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

ECL GROUP, LLC; ECL HOLDINGS,
LLC; EYE CARE LEADERS HOLDINGS,
LLC; EYE CARE LEADERS
PORTFOLIO HOLDINGS, LLC;
INTEGRITY EMR, LLC; INTEGRITY
EMR HOLDINGS, LLC; ALTA BILLING,
LLC; AND ALTA BILLING HOLDINGS,
LLC,

Defendants.

1:22-CV-00296-LCB-JLW

KIMBERLY FARLEY, CHAD
FORRESTER, AND KIMBERLY
SANDVIG, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

EYE CARE LEADERS HOLDINGS, LLC,

Defendant.

1:22-CV-00468-CCE-JLW

NOTICE PLAN

Pursuant to the Court's Order granting Preliminary Certification of the Settlement Classes and Preliminary Approval of the Class Action Settlement (Doc. 71), the parties jointly submit the Notice Plan to the Court. Attached hereto are:

- Declaration of Cameron R. Azari, Esq. Regarding Notice Plan;
- Proposed Long Form Notice;
- Proposed Physician Settlement Class Email Notice;
- Proposed Patient Settlement Class Email Notice;
- Proposed Physician Settlement Class Postcard Notice; and,
- Proposed Patient Settlement Class Claim Form.¹

WHEREFORE, the parties incorporate the attached Notice Plan documents and respectfully request that the Court approve the Notice Plan, schedule the fairness hearing, and establish deadlines for providing notice, objecting to the Settlement Agreement, filing a petition for a fee award, and filing briefs in support of final approval of the Settlement Agreement and certification.

¹ The Physician Settlement Class Claim Form shall be in a format substantially similar to the Patient Settlement Class Claim Form, except, consistent with the Settlement Agreement, it will have a section addressing entitlement to credits for class members who were under contract with Defendants as of April 2023 rather than sections addressing payment for out-of-pocket losses.

This the 5th day of September, 2023,

/s/ Patrick G. Spaugh

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behalf of themselves and all others similarly
situated*